

HON. JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

VALVE CORPORATION,

Plaintiff,

v.

LEIGH ROTHSCHILD, ROTHSCHILD
BROADCAST DISTRIBUTION SYSTEMS,
LLC, DISPLAY TECHNOLOGIES, LLC,
PATENT ASSET MANAGEMENT, LLC,
MEYLER LEGAL, PLLC, AND SAMUEL
MEYLER,

Defendants.

Case No. 2:23-cv-1016

**DECLARATION OF DARIO A.
MACHLEIDT IN SUPPORT OF LCR 37
JOINT SUBMISSION**

NOTE ON MOTION CALENDAR:
August 12, 2025

Complaint Filed: 07/07/2023

ORAL ARGUMENT REQUESTED

1 I, Dario A. Machleidt, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of Washington and am
3 admitted to this Court. I am a lawyer in the law firm of Kilpatrick Townsend & Stockton LLP,
4 counsel for Plaintiff Valve Corporation in the above-referenced action.

5 2. I have personal knowledge of the facts stated in this declaration and, if called upon
6 to do so, I could and would competently testify thereto.

7 3. Attached hereto as **Exhibit 1** is a true and correct copy of the complaint filed in
8 *Symbology Innovations, LLC v. Valve Corp.*, No. 2:23-cv-00419-JRG-RSP on September 15,
9 2023.

10 4. Attached hereto as **Exhibit 2** is a true and correct copy of the complaint filed in
11 *Social Positioning Input Systems, LLC v. Valve Corp.*, No. 2:23-cv-00422-JRG-RSP on September
12 18, 2023.

13 5. Attached hereto as **Exhibit 3** is a true and correct copy of the complaint filed in
14 *Quantum Tech. Innovations, LLC v. Valve Corp.*, No. 2:23-cv-00425-JRG-RSP on September 18,
15 2023.

16 6. Attached hereto as **Exhibit 4** is a true and accurate copy of a letter from
17 Christopher Schenck, Legal Counsel for Valve Corporation, to Samuel M. Meyler bearing Bates
18 number ROTHSCILD0000171–193.

19 7. Attached hereto as **Exhibit 5** is a true and correct copy of correspondence sent by
20 counsel for Valve to counsel for Defendants, dated April 25, 2024, and bearing the subject line
21 “*Social Positioning Input Sys., LLC v. Valve Corp., Gearbox Software L.L.C.*, No. 2:23-cv-422-
22 JRG-RSP (E.D. Tex. Sept. 18, 2023).”

23 8. Attached hereto as **Exhibit 6** is a true and correct copy of an email chain between
24 counsel for Valve and counsel for Defendants with the subject “Valve v. Rothschild et al. – Rule
25 45 Subpoenas.”

26 9. Attached hereto as **Exhibit 7** is a true and correct copy of correspondence sent by
27 counsel for Valve to counsel for Defendants, dated January 16, 2025.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed on August 12, 2025 at Seattle, Washington.

4
5 /s/ Dario A. Machleidt
Dario A. Machleidt
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28